

**EXHIBIT 1**

**Dinsmore & Shohl** LLP  
ATTORNEYS

Jennifer Orr Mitchell  
513-977-8364  
jennifer.mitchell@dinslaw.com

Admitted in Ohio and Kentucky

October 17, 2006

Darlington Amadasu  
P.O. Box 6263  
Cincinnati, OH 45206

Re: Darlington Amadasu v. Mercy Franciscan Hospital-Western Hills, et al.  
United States District Court, Southern District of Ohio, Western Division  
Case No. C-1-01-182

Dear Mr. Amadasu:

Given the upcoming discovery deadline of November 17, 2006, I would appreciate if you would supplement your responses to the Interrogatories and Requests for Production of Documents that we previously served upon you on behalf of Dr. Berry, prior to the stay of this lawsuit. As you may recall you objected to many of the requests and would not respond. In particular, I ask that you provide at least the following information in supplementation:

- a. Identification of all lawsuits in which you have been a party from 1990 to present.
- b. All correspondence between you and Defendant hospitals regarding you.
- c. All correspondence between you and any other individual or entities related to issues in this case.
- d. Identification of all of your employers, educational facilities and health care providers from 1990 to the present.
- e. All documents related to your employment from 1990 to the present, including but not limited to wage records and personnel records.
- f. All records reflecting health care provided to you from 1990 to the present, including but not limited to records of charges for same and related payment information.
- g. All records relating to your education received from 1990 to the present, including but not limited to medical residency training.
- h. All of your tax returns, with schedules, for the years 1990 to the present.
- i. Complete responses to the discovery requests previously served on you, including authorizations, so Defendants may obtain relevant documents on their own, to the extent you have not done so by responding to the items listed above.

255 East Fifth Street, Suite 1900 Cincinnati, OH 45202  
513.977.8200 513.977.8141 fax www.dinslaw.com

Darlington Amadasu  
Page 2

---

- j. All documents relating to and an itemization of your income from every source from 1990 to present, including income from disability payments and other financial assistance received by you.

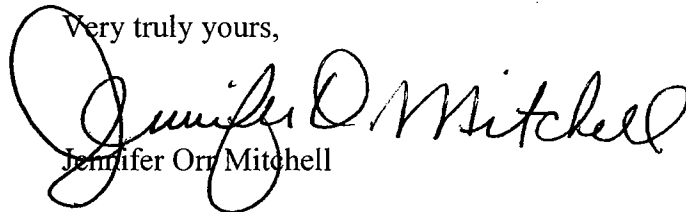
I have enclosed new authorizations in the event you can no longer locate those previously provided to you. We have requested these in the past and are entitled to them; however, you refused to sign them and asserted frivolous objections. The Judge then ordered you to sign them, yet you have not done so. You have placed your medical conditions and financial information at issue by filing this lawsuit and making the claims you have against Dr. Berry. We are entitled to complete answers and signed authorizations.

In addition, we would like to complete your deposition which was continued in progress. If you could provide potential dates and times on which you are available before November 17, 2006, we would appreciate it.

I would request that you respond with the requested responses, authorizations, and deposition dates on or before **October 24, 2006**. If you do not do so, I will notice your deposition for a date and time that are convenient for the Defendants and will ask the Court to intervene and require you to provide the information and authorizations to which we are entitled. Please consider this my last attempt to resolve these issues without involving the Court.

I look forward to hearing from you and thank you in advance for your anticipated cooperation.

Very truly yours,



Jennifer Orr Mitchell

JOM/rw  
Enclosures

cc: Karen A. Carroll, Esq. (w/ encls.)  
Deborah R. Lydon, Esq. (w/o encls.)